

# Cooper & Kirk

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## **VIA ECF**

The Honorable Loretta A. Preska  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: ***Giuffre v. Dershowitz*, Case No. 19-cv-3377-LAP**

Dear Judge Preska:

I write on behalf of Plaintiff Virginia Giuffre. Pursuant to Rule 1.E of Your Honor's Individual Practices, Plaintiff respectfully requests a brief extension of time from Tuesday, March 9, 2021 until Friday, March 12, 2021 to respond to Defendant's pre-motion letter filed on March 4, 2021, renewing Defendant's request that the Court compel non-party Leslie Wexner to submit to a deposition in this matter. Doc. 249. In support of this request, Plaintiff notes that this extension will not impact any other deadlines in this case; no prior extensions have been sought; and it is Plaintiff's understanding that Defendant has agreed to allow counsel for Mr. Wexner until March 12, 2021 to submit his response to Defendant's pre-motion letter. Defendant does not object to this requested extension provided he has until Tuesday, March 16, 2021 to file his reply. Plaintiff has no objection to that request.

In addition, pursuant to Rule 1.A of Your Honor's Individual Practices, Plaintiff requests leave to file under seal her response to Defendant's pre-motion letter. In support of this request, Plaintiff notes that the Court granted Defendant leave to file his pre-motion letter under seal, *see* Doc. 248, and Plaintiff will both be responding to that sealed filing as well as referencing and attaching excerpts of the deposition of John Zeiger, Esq. which have been designated as confidential under the applicable protective order, Doc. 168.

Respectfully,

s/ Nicole Jo Moss  
Nicole J. Moss

cc: Counsel of Record